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CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

08 CR 2587 DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

June 2008 Grand Jury

UNITED STATES OF AMERICA,)	Criminal Case No. _____
)	
Plaintiff,)	<u>I N D I C T M E N T</u>
)	
v.)	Title 8, U.S.C.,
)	Sec. 1324(a)(2)(B)(ii) -
ABRAHAM IBARRA (1),)	Bringing in Illegal Aliens for
FELIX ADOLFO IBARRA (2),)	Financial Gain; Title 8, U.S.C.,
)	Sec. 1324(a)(2)(B)(iii) -
Defendants.)	Bringing in Illegal Aliens Without
)	Presentation; Title 18, U.S.C.,
)	Sec. 2 - Aiding and Abetting

The grand jury charges:

Count 1

On or about July 26, 2008, within the Southern District of California, defendants ABRAHAM IBARRA and FELIX ADOLFO IBARRA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Patricia Rivera-Mata, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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SLF:em:San Diego
8/4/08

Count 2

On or about July 26, 2008, within the Southern District of California, defendants ABRAHAM IBARRA and FELIX ADOLFO IBARRA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Patricia Rivera-Mata, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien and upon arrival did not bring and present said alien immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii), and Title 18, United States Code, Section 2.

Count 3

On or about July 26, 2008, within the Southern District of California, defendants ABRAHAM IBARRA and FELIX ADOLFO IBARRA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Maria Del Carmen Gomez-Nunez, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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Count 4

On or about July 26, 2008, within the Southern District of California, defendants ABRAHAM IBARRA and FELIX ADOLFO IBARRA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Maria Del Carmen Gomez-Nunez, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien and upon arrival did not bring and present said alien immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii), and Title 18, United States Code, Section 2.

Count 5

On or about July 26, 2008, within the Southern District of California, defendants ABRAHAM IBARRA and FELIX ADOLFO IBARRA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Imelda Alvarez-Cedillo, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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Count 6

On or about July 26, 2008, within the Southern District of California, defendants ABRAHAM IBARRA and FELIX ADOLFO IBARRA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Imelda Alvarez-Cedillo, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien and upon arrival did not bring and present said alien immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii), and Title 18, United States Code, Section 2.

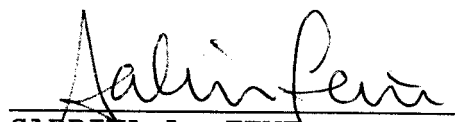
DATED: August 6, 2008.

A TRUE BILL:


Foreperson

KAREN P. HEWITT
United States Attorney

By:


SABRINA L. FEVE
Assistant U.S. Attorney